

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JESUS RAMOS,

Petitioner,

v.

MELISSA HAINSWORTH, et al.,

Respondents.

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CIVIL ACTION

NO. 18-4920

ORDER

AND NOW, this _____ day of _____, 2019, upon
consideration of the Petitioner's Motion for a Thirty Day Extension of Time for Leave to
File an Amended Petition,

IT IS ORDERED that the motion is **GRANTED**, and Petitioner's Motion for
Leave to File an Amended Petition (attaching any proposed Amended Petition as an
exhibit to the Motion) shall be filed on or before January 29, 2019.

BY THE COURT:

HENRY S. PERKIN
UNITED STATES MAGISTRATE JUDGE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JESUS RAMOS	:	
	:	Civil Action
v.	:	No. 18-4920
	:	
MELISSA HAINSWORTH, et. al.	:	

PETITIONER’S MOTION FOR EXTENSION OF TIME

Petitioner Jesus Ramos respectfully requests that this Court provide additional time for newly retained counsel to review this case and to file a motion for leave to file an Amended Petition for Writ of Habeas Corpus within 30 days. In support thereof, he avers as follows:

1. Petitioner filed a *pro se* Petition for Writ of Habeas Corpus under 18 U.S.C. § 2254.
2. Petitioner retained the undersigned’s firm in October 2019.
3. This Court granted Petitioner’s counsel 60 days to review the case and to file a motion for leave to file an amended *habeas corpus* petition with accompanying petition. The motion is currently due December 30, 2019.
4. The undersigned’s firm has diligently used the 60 days to investigate the case and prepare an amended petition.
5. However, the undersigned has been unable to prepare an appropriate petition in the time allotted.
6. Petitioner therefore respectfully requests an additional 30 days to prepare the motion and proposed amended petition.
7. Petitioner would not request another extension absent extraordinary circumstances.

WHEREFORE, Petitioner, Jesus Ramos, respectfully requests a 30-day extension of time to file a motion for leave to file an amended § 2254 petition and accompanying petition.

Respectfully submitted,

/s/ Daniel J. Auerbach

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Counsel for Petitioner

Dated: December 27, 2019

CERTIFICATE OF SERVICE

I Robert M. Gamburg, Esquire hereby certify that I am this day electronically filing this motion, providing seervice upon the following:

ADA Michael Scalera
District Attorney's Office
Three South Penn Square
Philadelphia, PA 19107

/s/ Daniel J. Auerbach

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Counsel for Petitioner

Dated: December 27, 2019